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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey corporation, d/b/a “My Forex Funds”; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**NOTICE OF DEFENDANTS’
EMERGENCY MOTION ON
SHORTENED NOTICE, PURSUANT
TO F.R.C.P. 65(b)(4) TO MODIFY
THE EX PARTE STATUTORY
RESTRAINING ORDER,
APPOINTMENT OF TEMPORARY
RECEIVER, AND OTHER
EQUITABLE RELIEF**

Oral Argument Requested

PLEASE TAKE NOTICE that on upon the Declaration of Dakota Speas, dated September 18, 2023, the Declaration Murtuza Kazmi. Dated September 18, 2023, the Memorandum of Law in Support of Defendants' Motion to Modify Plaintiff's Motion for an *Ex Parte* Statutory Restraining Order Appointment of Temporary Receiver and Other Equitable Relief, dated September 18, 2023, and all prior pleadings and proceedings herein, Defendants Traders Global Group Incorporated, a New Jersey corporation doing business as "My Forex Funds," Traders Global Group Incorporated, a Canadian business organization, and Murtuza Kazmi (collectively, "Defendants"), by and through their undersigned counsel will move this Court before the Honorable Zahid N. Quraishi , U.S.D.J. at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Room 4W, Trenton, New Jersey 08608, upon 2 days' notice pursuant to F.R.C.P. 65(b)(4) and at a time to be determined by the Court, or as soon thereafter as counsel may be heard, will move for an Order pursuant to Rule 65(b)(4) of the Federal Rules of Civil Procedure modifying the Order Granting Plaintiff's Motion for an *Ex Parte* Statutory Restraining Order, Appointment of Temporary Receiver, and Other Equitable Relief entered on August 29, 2023 (ECF 13) (the "SRO").

PLEASE TAKE FURTHER NOTICE that a proposed form of Order accompanies this motion.

PLEASE TAKE NOTICE that pursuant to Rule 65(b)(4) of the Federal Rules of Civil Procedure, Defendants wish to be heard upon 2 days' notice of the date herein or upon such shortened notice as set by the Court.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument on this motion via Zoom or a telephonic hearing, given the emergency nature of the relief sought.

Dated: New York, New York
September 18, 2023

By /s/ Anthony J. Staltari

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